Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Tampa Transflo Terminal

On-Site Inspection Start Date: 03/30/2021 **On-Site Inspection End Date:** 03/30/2021

ME ID#: 37009 **EPA ID#:** FLR000105338

Facility Street Address: 504 N 34th St, Tampa, Florida 33605-6200

Contact Mailing Address: 500 Water St #J975, Jacksonville, Florida 32202-4423

County Name: Hillsborough **Contact Phone:** (904) 259-2279

NOTIFIED AS:

Transfer Facility, Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste, Transfer Facility

INSPECTION TYPE:

Routine Inspection for Used Oil Transfer Facility Facility

Routine Inspection for Used Oil Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Sarah M Brownlee, Inspector

Other Participants: Leslie Pedigo, Environmental Consultant; Kevin Roberts, Railway Manager

LATITUDE / LONGITUDE: Lat 27° 57' 5.8056" / Long 82° 25' 21.1206"

NAIC: 488210 - Support Activities for Rail Transportation

TYPE OF OWNERSHIP: Private

Introduction:

An inspection was conducted at Tampa Transflo Terminal ("Tampa Transflo") on March 30, 2021 by the Florida Department of Environmental Protection ("Department") to determine the facility's compliance with state and federal regulations for very small quantity generators of hazardous waste and used oil transporters. Tampa Transflo has been inspected several times by the Department most recently being February 15, 2018. The facility last notified on October 8, 2020 as a very small quantity generator of hazardous waste; this status was verified during the inspection. The facility is also currently notified as HW Transporter, HW Transfer Facility (expires on 06/30/2021), Used Oil Transporter, and a Used Oil Transfer Facility (expires on 06/30/2021). Inspectors were assisted by Kevin Roberts, terminal manager, during the inspection.

Process Description:

The Tampa Transflo Terminal is a rail to truck and truck to rail transfer facility for bulk commodities, including used oil and non-hazardous goods. Materials are loaded into rail cars by the truck drivers and stored on site until full cars are transferred to CSX for transport to either the next non-rail transporter or the destination facility. The facility previously used to store and transfer hazardous waste, but discontinued the practice in early 2020. Other then no longer handling hazardous waste, operations at the facility have not changed since previous inspections. While Arrow Material Services was previously contracted to operate this facility, since July 2019, the operations have been contracted to Road and Rail Services. Kevin Roberts remains the terminal manager. Tampa Transflo currently has 13 full time employees. The facility is on City of Tampa water and sewer.

The records review for the facility was performed prior to the facility walk through. Hazardous waste manifest records up until their final shipment on June 8, 2020 were reviewed and appeared to be complete. Used oil shipment records were reviewed and appeared to be complete. In lieu of a traditional weekly hazardous waste inspection log, Tampa Transflo maintained a 10 day storage log for hazardous waste while it was still on site and continues to maintain a 35 day storage log for used oil, which recorded all needed information. The 35-day

storage clock starts with the initial transfer of used oil into a rail car. Records showed that no waste was stored on site for more than the allowable limit. The facility maintains a contingency plan and has annual training records that were available for review.

Used oil is transferred and stored on one half of track #5 (the other half is for cement transfers). According to Mr. Roberts, arriving rail cars are inspected within 24 hours or arriving and again prior to leaving. At the time of the inspection, there were (3) railcars present that were labeled used oil. Track pans are in place, and any spills which are not contained by the pan will drain to a trench which drains through a junction box to the facility's central storm water collection sump. Knife valves are able to isolate the trenches and a secondary valve is present if needed to prevent the discharge of the facility's storm water system in the event of a spill. Emergency equipment, including spill kits, decontamination showers and fire extinguishers are in place next to the tracks. Staff are all equipped with communication devices while working on site.

At the time of the inspection, a storage shed on the property contained: (3) 55-gallon drums of used absorbents, (2) 55-gallon drums of used oil filters, (1) 55-gallon drum of aerosol cans, (1) 55-gallon drum of used oil, and (1) 55-gallon drum of product (cement additive). A second 55-gallon used oil drum was empty at the time of the inspection. The aerosol cans are being managed as universal waste under the new rule 40 CFR 273.6. All containers were properly closed and labeled as required.

PHOTO ATTACHMENTS:

Track Pans



Spill Response Kit Near Tracks



Storage Shed



Storage Shed



Conclusion:

At the time of the inspection, Tampa Transflo Terminal was operating in compliance with state and federal regulations for very small quantity generators of hazardous waste and used oil transporters.

2.0: VSQG Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Standards for Very Small Quantity Generators	Yes	No	N/A
2.1	Generator Size Determination (If the answer is No for any one question then facility is not a VSQG)			
2.2	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? 262.14(a)(1)	✓		
2.3	Does the facility generate less than 1kg/mo of acutely toxic (P-listed, 40 CFR 261.33(e)) hazardous wastes? 262.14(a)(1)	✓		
2.4	Does the facility accumulate onsite no greater than 1,000 Kilograms (2,200 pounds) of hazardous waste at any one time? 262.14(a)(4)	✓		
2.5	Does the facility accumulate onsite less than a total of 1 kg of acute hazardous waste listed in 261.31 or 261.33(e)? 262.14(a)(3)	✓		
Item No.	Hazardous Waste Determination	Yes	No	N/A
2.6	Has the facility properly identified all hazardous waste streams? (Check any that are not OK) 262.11 ☐ Is it excluded under 261.4? ☐ Is it listed in subpart D of 261 or appendix IX of 261? ☐ Has the waste been analyzed? ☐ Has generator knowledge of the hazard characteristics of the waste in light of the materials used been applied?	✓		
Item No.	Record Keeping	Yes	No	N/A
2.7	Has the facility documented delivery of its hazardous waste to a facility permitted or authorized to accept the waste? (Check any that are not OK) 262.14(a)(5) ☐ Name and address of the generator and TSD/authorized facility. ☐ Type and amount of hazardous waste delivered. ☐ Date of shipment	✓		
2.8	Are written records and other receipts documenting proper disposal retained for at least 3 years? 62-730.030(2)	✓		

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Sarah M Brownlee	Inspector	
Principal Investigator Name	**Principal Investigator Title**	
	DEP	04/20/2021
Principal Investigator Signature	**Organization**	**Date**

Leslie Pedigo	Environmental Consultant
Inspector Name	**Inspector Title**
	DEP
	Organization

Kevin Roberts	Railway Manager
Representative Name	**Representative Title**
	Road & Rail Services
	Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver: Michael C Lynch **Inspection Approval Date:** 04/21/2021